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STIPULATED [PROPOSED] ORDER MODIFYING SEALING PROCEDURES RELATING TO PLAINTIFFS'
MOTION FOR SANCTIONS

Case No. 3:21-md-02981-JD; 3:20-cv-05761-JD; 3:20-cv-05792-JD; 3:22-cv-02746-JD

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION

Case No. 3:21-md-02981-JD

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

In re Google Play Consumer Antitrust Litigation, Case No. 3:20-cv-05761-JD

In re Google Play Developer Antitrust Litigation, Case No. 3:20-cv-05792-JD

State of Utah et al. v. Google LLC et al.,
Case No. 3:21-cv-05227-JD

Match Group, LLC et al. v. Google LLC et al., Case No. 3:22-cv-02746-JD

**STIPULATED [PROPOSED] ORDER
MODIFYING SEALING PROCEDURES
RELATING TO PLAINTIFFS' MOTION
FOR SANCTIONS**

Courtroom: 11, 19th Floor (via Zoom)

Judge: Hon. James Donato

1 WHEREAS, Epic Games, Inc., the Consumer Plaintiffs, the Developer Plaintiffs, the State
2 Plaintiffs, the Match Group Plaintiffs and the Google Defendants (collectively the “Parties”)
3 respectfully move this Court for a modification to the sealing procedures applicable to the joint
4 statement to be filed on May 27, 2022 in accordance with the Court’s May 12, 2022 Notes and
5 Order (Dkt. # 230) on the grounds set forth herein.

6 WHEREAS, in accordance with the Notes and Order, the Parties will file a joint statement
7 setting forth the Parties’ proposal for a “method of resolution” of their dispute concerning
8 document preservation by the Google Defendants, which will include “a proffer from Plaintiffs”
9 and supporting exhibits; and

10 WHEREAS, the Google Defendants may take the position that the joint statement and
11 supporting exhibits may contain material that should be filed under seal consistent with the
12 operative Protective Order and Local Rule 79-5;

13 WHEREAS, Plaintiffs disagree that any of the material cited in the joint statement or the
14 supporting exhibits meets the standard for filing under seal but agree to permit the Google
15 Defendants additional time to review whether a sealing motion is necessary; and

16 WHEREAS, the Parties wish to conserve the resources of the Court and the Parties and to
17 avoid the need to brief multiple sealing motions with respect to the joint statement and Plaintiffs’
18 forthcoming motion for sanctions, and further believe it will be most efficient to handle all sealing
19 issues, if any, in omnibus sealing motions to be filed shortly following the briefing on Plaintiffs’
20 motion for sanctions.

21 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED SUBJECT TO
22 THE COURT’S APPROVAL:

23 • The Parties may file redacted versions of the Parties’ May 27, 2022 joint statement,
24 Plaintiffs’ motion for sanctions, the Google Defendants’ opposition to the motion,

1 Plaintiffs' reply brief, and any associated supporting documents, as separate entries on
2 the ECF docket;

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- If any material is filed in redacted form, the Parties shall also contemporaneously file unredacted copies of all documents on the ECF docket provisionally under seal, along with a 1-page interim sealing motion which may indicate that the reasons for sealing will be discussed in a forthcoming omnibus sealing motion; and
- The Parties and any affected third parties shall jointly file omnibus sealing motions within 14 days after the filing of the Plaintiffs' reply brief in support of the motion for sanctions.

10 Dated: May 26, 2022

BARTLIT BECK LLP
Karma M. Giulianelli

11

12 KAPLAN FOX & KILSHEIMER LLP
Hae Sung Nam

13 Respectfully submitted,

14 By: /s/ Karma M. Giulianelli
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16 *Co-Lead Counsel for the Proposed Class in*
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17 Dated: May 26, 2022

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22 *Liaison Counsel for the Proposed Class in*
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1 Dated: May 26, 2022

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9 *Epic Games, Inc. v. Google LLC et al.*

10 Dated: May 26, 2022

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18 Dated: May 26, 2022

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1 Dated: May 26, 2022

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9 Dated: May 26, 2022

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18 Dated: May 26, 2022

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1 Dated: May 26, 2022

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7 *Counsel for Defendants Google LLC et al.*

8 Dated: May 26, 2022

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Utah et al. v. Google LLC et al.

19
20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21 Dated: _____

22 _____
23 HON. JAMES DONATO
24 United States District Judge

E-FILING ATTESTATION

I, Stephen J. McIntyre, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ *Stephen J. McIntyre*